Remarks

This Application has been carefully reviewed in light of the Office Action mailed June 4, 2003. Applicants appreciate the Examiner's consideration of the Application. In order to clarify various aspects of Applicants' claims, Applicants have cancelled Claims 1-12 without prejudice or disclaimer and have added new Claims 13-46. These amendments are not considered necessary for patentability and have not introduced any new matter. Applicants respectfully request consideration and allowance of all pending claims.

The Examiner rejects Claims 1-12 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,400,366 to Davies, et al. ("*Davies*"). Applicants have cancelled Claims 1-12 and added new Claims 13-46. To expedite this case to issuance, Applicants demonstrate below that *Davies* fails to disclose, teach, or suggest the limitations recited in new Claims 13-46.

Davies discloses a method and system for the interactive visualization and examination of data. (Abstract; Column 1, Lines 66-67) According to *Davies*, data may be organized along an axis of a displayed graph into one or more ranges. (FIGURE 2; Column 3, Lines 43-48) *Davies* discloses that the data to be visualized is divided equally into a specified number of buckets for each axis of the visualization. (Column 4, Lines 46-49) For example, in describing FIGURE 2, *Davies* states that "each axis has a maximum of ten buckets, for a total of one hundred grid intersections, and system 20 automatically defines the bucket ranges and organizes the data within these buckets appropriately." (Column 4, Lines 49-53) *Davies* states, "By default, the bucket ranges for each axis are defined by dividing the absolute range of values in the data set for the corresponding axis into equal size ranges . . . ." (Column 4, Lines 64-66) Thus, each axis disclosed in *Davies* has a specified number of buckets (i.e. a specified number of subdivisions along the axis) and the data to be displayed along the axis is divided equally into ranges based on the specified number of buckets for the axis.

According to *Davies*, a user may alter the visualization by adding or removing buckets. (Column 5, Lines 42-45) By adding buckets, the visualization acquires a finer granularity, having a smaller range of data represented within each bucket. By removing

buckets, the visualization acquires a coarser granularity, having a larger range of data represented within each bucket. (*See* Column 5, Lines 45-53) However, when a user alters the number of buckets, thereby drilling into or out of the data, the system must re-render the data to fit the specified number of buckets, and there is no predetermined relationship between the data from one level of granularity to the next. For example, in FIGURE 2 of *Davies*, the "Rate of Return 1 Year" axis is divided into ten buckets, each representing fifteen percentage points from a minimum of negative sixty percent to a maximum of positive ninety percent. (*See* FIGURE 2) As illustrated in FIGURE 5 of *Davies*, the same minimum (negative sixty percent) and maximum (positive ninety percent) are displayed along the "Rate of Return 1 Year" axis; however, the data is now divided into fifteen buckets. Thus, the size of the range for each bucket has decreased from fifteen percentage points to ten percentage points. While the user is seeing data at a finer level of granularity, there is no predetermined relationship between the data shown in FIGURE 2 and the data shown in FIGURE 5.

In contrast, new independent Claim 13 recites:

A system for displaying graphical information related to a supply chain, comprising:
a database operable to store data associated with the supply chain; and
a graphical user interface (GUI) coupled to the database and operable to:
display a graph comprising a plurality of axes, a first axis being associated with a first dimension of the supply chain data, *the first dimension for the first axis being associated with a first predetermined hierarchical arrangement of supply chain data for the first dimension* comprising:
a plurality of levels each comprising one or more members; and

a parent member in a first level being related to one or more child members in a second level through a predetermined hierarchical relationship such that supply chain data for the parent member in the first level represents an aggregation of supply chain data for the one or more related child members in the second level and such that supply chain data for the one or more related child members in the second level represents a disaggregation of supply chain data for the parent member in the first level;
in response to selection of the first level for display of supply chain data with respect to the first axis, display on the graph a graphical representation of supply chain data for the one or more members in the first level, *at least one member in the first level being the parent member having the one or more related child members in the second level and representing an aggregation of supply chain data for the one or more related child members*; and
in response to selection of the second level for display of supply chain data with respect to the first axis, display on the graph a graphical

representation of supply chain data for the one or more members in the second level, *one or more members in the second level being the one or more related child members of the parent member in the first level and representing a disaggregation of supply chain data for the parent member.*

As the above discussion makes clear, *Davies* fails to disclose, teach, or suggest these limitations. Accordingly, Applicants respectfully request consideration and allowance of new independent Claim 13, together with all claims that depend from independent Claim 13. Independent Claims 24, 35, and 46 are allowable for reasons substantially similar to those discussed above with respect to independent Claim 13. Accordingly, Applicants respectfully request consideration and allowance of independent Claims 24, 35, and 46, together with all claims that depend from independent Claims 24, 35, and 46.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

A check for $364.00 is included to cover the cost of one additional independent claim over three and fourteen additional dependent claims over twenty total. Although Applicants believe no other fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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